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WAILAN, S.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC.,

Plaintiff,

-against-

ALCOA STEAMSHIP CO., INC. and the Other
Entities Listed on Exhibit A to Second Amended
Complaint,

Defendants.

X

04 Civ. 04309 (LAK) (JCF)

STIPULATION OF INLAND LAKES
MANAGEMENT, INC. AND
LAFARGE NORTH AMERICA, INC.
TO BE BOUND BY THE FINAL
DECISIONS OF THIS COURT OR
THE FINAL SETTLEMENT OF THE
PARTIES

X

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff, American
Steamship Owners Mutual Protection and Indemnity Association, Inc. [the "American
Club"] and defendants, Inland Lakes Management, Inc. and Lafarge North America, Inc.
["ILM" and "Lafarge"], through their respective counsel, as follows:

1. ILM and Lafarge were members of the American Club in various Insurance Years
before February 20, 1989.

2. In consideration of the following provisions, and solely with respect to the
insurance years of their membership in the American Club, ILM and Lafarge hereby
agree to be irrevocably bound (a) by the final decisions of this Court, after appeals, if
any, with respect to the claims and defenses of all parties adjudicated in this action, or, in
the alternative (b) by the terms of any final settlement agreement entered into by all of the
defendants which have actively prosecuted their claims and defenses in this action and
which settlement terminates this action.

3. Unless otherwise requested, in writing, ILM and Lafarge need not make a further appearance herein or serve or file any additional pleadings, and ILM's and Lafarge's failure to do so will not be deemed a default.

4. ILM and Lafarge may be deleted from all service lists herein and no pleadings or notices need be served by any party upon ILM and Lafarge.

5. ILM and Lafarge agree to respond to discovery served upon it by any other party to this action, reserving all proper objections thereto they may have.

6. ILM and Lafarge will be notified of the final resolution of this action.


7. ILM and Lafarge agree that this Court has personal jurisdiction over them in this action and that this Stipulation may be enforced against them by this Court.

8. All defendants who have appeared in this action have been given notice of this Stipulation and an opportunity to object thereto; and to date, no objections have been received.

Dated: April 3, 2006
New York, New York


American Steamship Owners Mutual
Protection & Indemnity Assoc., Inc.

By:

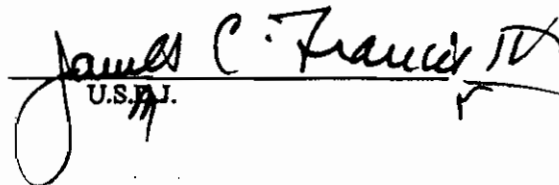

Lawrence J. Bowles (LB 5950)
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One Exchange Plaza
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(212) 952-6200

Inland Lakes Management, Inc. and
Lafarge North America, Inc.

By:


Charles A. Stewart, III (CS 7099)
Stewart Occhipinti, LLP
65 West 36th Street - 7th Floor
New York, New York 10018
(212) 239-5500

SO ORDERED:


James C. Francis IV
U.S.J.